


EXHIBIT B

Recap of this afternoon's meet and confer session

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Fri 11/18/2022 3:03 PM

To: Vince M. Avery <VAvery@fordharrison.com>

 3 attachments (1 MB)

Deficiency Letter (102122).pdf; Challenge Letter (102122).pdf; Proposed Third Revised Civil Case Managment Plan (111722).pdf;

Good afternoon Mr. Avery,

I would like to memorialize this afternoon's meet and confer session:

1. You will fully respond to the Deficiency letter dated October 21, 2022 by next Monday, November 21, 2022. (please see the attached Deficiency Letter)
2. You will fully respond to the Challenge letter dated October 21, 2022 by next Monday, November 21, 2022. (please see the attached Challenge Letter)
3. You will inform me whether you would consent to the proposed third revised Civil Case Management Plan within 10 minutes after the meet and confer session. However, I still have not received your response yet. (Please see the attached proposed third revised Civil Case Management Plan)
4. You will respond to our settlement offer by 5pm today or by 5pm next Monday, November 21, 2022.
5. You will provide us available deposition dates of each of the following witnesses by next Monday, November 21, 2022. Please provide us three (3) available deposition dates of each of the following witnesses between December 5, 2022 and December 14, 2022:

(1) Michael J. Lesser (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(2) Daniel E. Frye (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(3) Ryan Pak (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(4) Walter J. O'Meara (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(5) Brian Bo Young Park, Esq. (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(6) Jennifer Kim, Esq. (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(7) Hannah Jang (attended both the Board of Directors Special Meeting and the Audit Committee Special Meeting on March 16, 2020)

(8) Jeong Hoon Cho (attended the Board of Directors Special Meeting on March 16, 2020)

(9) Tae Won Suh (Former President of Shinhan Bank America)

(10) Uhyun Nam (First Vice President of Human Resources of Shinhan Bank America)

(11) Dae-Ki Min (attended the Board of Directors Special Meeting on March 16, 2020)

(12) Geon Woo Do (attended the Board of Directors Special Meeting on March 16, 2020)

Thank you.

Sincerely,

Byoung-Chul Yoo, Esq.

